

## **REMARKS**

In view of the above amendments and the following remarks, reconsideration and further examination are respectfully requested.

### **I. Telephone Interview**

The Applicants would like to thank Examiner Leiby for granting and conducting a personal interview on July 19, 2011 in connection with the above-identified application.

During the interview, the Applicants' representative emphasized the fact that independent claim 9 recites that the visual processor determines the conversion characteristic, such that, with respect to a specific brightness of the input image signal and as the brightness of the processed signal increases, a value of the output converted signal decreases.

The Examiner explained that he was interpreting the claimed "processed signal" broadly, such that there is not a causal connection between the spatially processed plurality of pixels surrounding the target pixel and the processed signal. As a result, the Examiner suggested amending the independent claims to clarify that the processes signal is obtained based on the spatially processed plurality of pixels surrounding the target pixel, in order to force the Examiner to a more narrow interpretation of the processed signal.

Furthermore, the Examiner indicated that this narrower interpretation of the processed signal will carry on throughout the claim and will also change the interpretation of the determination of the conversion characteristic. As such, the Examiner indicated that he would most likely have to update his search if such amendments are submitted.

Additionally, the Examiner kindly indicated that he would **not** issue a final Office Action, if the Applicants made such an amendment to the independent claims.

## **II. Amendments to the Claims**

Based on the above-mentioned interview, independent claims 9, 21 and 23-25 have been amended as suggested by the Examiner.

## **III. 35 U.S.C. § 103(a) Rejection**

Claims 9, 10, 12 and 21-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hansen (U.S. 6,069,597). This rejection is believed clearly inapplicable to amended independent claims 9 and 21-25 for the following reasons.

Amended independent claim 9 recites a visual processing device including a parameter outputter determining/outputting an adjustment parameter according to ambient light. In addition, claim 9 recites that the visual processing device includes a spatial processor spatially processing pixels surrounding a target pixel of an input image signal, so as to generate and output a processed signal based on the spatially processed plurality of pixels surrounding the target pixel of the input image signal, and includes a visual processor receiving the input image signal, the processed signal and the adjustment parameter, for determining a conversion characteristic according to the (spatially) processed signal, for adjusting the determined conversion characteristic to an adjusted conversion characteristic according to the adjustment parameter, and for converting the target pixel of the input image signal according to the adjusted conversion characteristic, so as to output an output converted signal. Further, claim 9 recites that the visual processor determines the conversion characteristic, such that, with respect to a specific brightness of the input image signal and as the brightness of the processed signal increases, a value of the output converted signal decreases. Claim 9 also recites that the visual processor adjusts the determined conversion characteristic, such that, according to the adjustment

parameter, as a brightness of the ambient light increases, at least one of a brightness and a local contrast of the output converted signal increases. Hansen fails to disclose or suggest the above-mentioned distinguishing features, as required by amended claim 9.

Rather, as discussed during the above-mentioned interview, Hansen teaches that the brightness of the output signal increases as the ambient light increases, such that the increased brightness of the output signal is obtained by increasing an on-time via the output signal (see col. 8, lines 21-45).

Thus, in view of the above, it is clear that Hansen merely teaches that the brightness of the output signal increases when the brightness of the ambient light increases, but fails to disclose or suggest that the visual processor determines the conversion characteristic, such that, with respect to a specific brightness of the input image signal and as the brightness of the processed signal (obtained based on the spatially processed plurality of pixels surrounding the target pixel of the input image signal) **increases**, a value of the output converted signal **decreases**, as recited in claim 9.

In other words, even though Hansen takes into account the brightness of the ambient light when determining the brightness of the output signal, Hansen does not take into account (i) the specific brightness of the input image signal, (ii) the brightness of the processed signal obtained based on spatially processing the plurality of pixels surrounding the target pixel, and (iii) the adjustment parameter determined based on the ambient light, when adjusting the value of the output converted signal, as required by claim 9.

Furthermore, in addition to not taking into account (i)-(iii) as mentioned above, Hansen teaches that the brightness of the output signal increases as the ambient light increases, which is completely different from determining the conversion characteristic, such that, with respect to a

specific brightness of the input image signal and as the brightness of the processed signal increases, a value of the output converted signal **decreases**, as recited in claim 9.

Therefore, because of the above-mentioned distinctions it is believed clear that independent claim 9 and claims 12 and 17 that depend therefrom would not have been obvious in view of Hansen.

Furthermore, there is no disclosure or suggestion in Hansen or elsewhere in the prior art of record which would have caused a person of ordinary skill in the art to modify Hansen to obtain the invention of independent claim 9. Accordingly, it is respectfully submitted that independent claim 9 and claims 12 and 17 that depend therefrom are clearly allowable over the prior art of record.

Amended independent claims 21, 23, 24 and 25 are directed to a device, a method, a processor and a program, respectively and each recite features that correspond to the above-mentioned distinguishing features of independent claim 9. Thus, for the same reasons discussed above, it is respectfully submitted that independent claims 21, 23, 24 and 25 and claim 22 that depends therefrom are allowable over Hansen.

#### **IV. Conclusion**

In view of the above amendments and remarks, it is submitted that the present application is now in condition for allowance and an early notification thereof is earnestly requested. The Examiner is invited to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,

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